

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERK'S OFFICE
2016 MAR 15 PM 3 43
U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA,

Plaintiff,

v.

DZHOKHAR A. TSARNAEV,

Defendant.

CRIMINAL ACTION
NO. 1:13-cr-10200-GAO

**MOTION OF BOSTON GLOBE MEDIA PARTNERS, LLC
FOR PUBLIC ACCESS TO CRIMINAL JUSTICE ACT MATERIALS**

Boston Globe Media Partners, LLC (the "Globe") respectfully moves for public access to materials submitted on behalf of defendant pursuant to the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A (2000). More specifically, the Globe seeks access to the following CJA materials:

1. All amounts paid under the CJA to defense counsel, investigators, experts, or other persons or entities paid for services provided to the defendant in connection with his defense; and
2. All CJA vouchers seeking payments for defense counsel and for investigative, expert, or other services provided to the defendant in connection with his defense, including all detailed information on vouchers provided to justify the expenses to the court.

As grounds for its motion, the Globe relies on its Memorandum of Law, filed herewith.

Respectfully submitted,

Boston Globe Media Partners, LLC

By Its Attorneys,

/s/ Emma D. Hall

Jonathan M. Albano, BBO #013850

Emma D. Hall, BBO #687947

jonathan.albano@morganlewis.com

emma.hall@morganlewis.com

MORGAN, LEWIS & BOCKIUS LLP

One Federal Street

Boston, MA 02110-1726

+1.617.341.7700

Dated: March 15, 2016

CERTIFICATE OF SERVICE

I, Emma D. Hall, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 15, 2016.

/s/ Emma D. Hall

Emma D. Hall